NOAA's Grants Management Division presents THE CUCENT 2015

Financial Assistance Workshop GMD Connected: The New Decade

Government Ethics Rules
For Grants Administrators and Grantees
Arthur Warren
Senior Counsel for Ethics

What's New In Financial Assistance





FINANCIAL CONFLICTS OF INTEREST AVOID SELF-DEALING

A NOAA EMPLOYEE MAY NOT WORK ON A GRANT OR APPLICATION THAT WILL AFFECT THE EMPLOYEE'S FINANCIAL INTERESTS

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PERSONAL RELATIONSHIPS **AVOID APPEARANCES OF FAVORITISM**

A NOAA EMPLOYEE MAY NOT WORK ON A GRANT OR APPLICATION FROM AN ORGANIZATION IN WHICH THE EMPLOYEE IS ACTIVE OR HOLDS A POSITION OR BY WHICH SHE/HE WAS RECENTLY EMPLOYED

GIFTS AVOID UNDUE INFLUENCE

A NOAA EMPLOYEE MAY NOT ACCEPT A GIFT FROM A GRANTEE OR APPLICANT, UNLESS AN EXCEPTION APPLIES, SUCH AS:

- A GIFT OF \$20 OR LESS
- AN INVITATION TO A "WIDELY-ATTENDED GATHERING"

GIFTS AVOID UNDUE INFLUENCE

A NOAA EMPLOYEE MAY NOT ACCEPT A GIFT ON BEHALF OF NOAA, SUCH AS A TRAVEL GIFT, FROM A **GRANTEE OR GRANT APPLICANT**

OUTSIDE ACTIVITIES AVOID DIVIDED LOYALTIES

A NOAA EMPLOYEE MAY NOT ACCEPT EMPLOYMENT WITH, OR PROVIDE **VOLUNTARY SERVICES TO, AN** ORGANIZATION, INCLUDING A GRANTEE OR APPLICANT, WITH MATTERS BEFORE THE EMPLOYEE'S OFFICE

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NEITHER A NOAA EMPLOYEE NOR A **GRANTEE MAY USE GOVERNMENT** RESOURCES FOR ANYTHING OTHER THAN **AUTHORIZED PURPOSES**

SEEKING EMPLOYMENT WITH A GRANTEE AVOID DIVIDED LOYALTIES

 A NOAA EMPLOYEE MAY EXPLORE EMPLOYMENT WITH A GRANTEE OR APPLICANT, BUT MUST STOP ALL WORK ON THE GRANT OR AN APPLICATION WHILE EMPLOYMENT DISCUSSIONS ARE **ONGOING**

RESTRICTIONS AFTER LEAVING **GOVERNMENT SERVICE AVOID MISUSE OF POSITION**

- A NOAA EMPLOYEE MAY WORK FOR A GRANTEE AFTER LEAVING FEDERAL **SERVICE, BUT:**
 - MAY NOT CONTACT NOAA ABOUT GRANTS THE EMPLOYEE WORKED ON
 - **MAY NOT DISCLOSE NON-PUBLIC INFORMATION**

RESTRICTIONS ON A FORMER GRANTEE **WORKING FOR THE GOVERNMENT**

 A GRANTEE MAY WORK FOR THE **GOVERNMENT AFTER LEAVING THE** GRANTEE ORGANIZATION, BUT CANNOT WORK ON ANY MATTERS IN WHICH THE ORGANIZATION IS A PARTY FOR ONE YEAR, UNLESS SPECIAL AUTHORIZATION IS GIVEN

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HAVE QUESTIONS? NEED ADVICE?

• CONTACT:

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